Exhibit G

# W. R. Grace Asbestos Personal Injury Questionnaire



Case 01-01139-AMC Doc 13626-9 Filed 11/10/06 Page 3 of 50

WR GRACE PIQ 017400-00B2

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# IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE



In re:	) Chapter 11
W. R. GRACE & CO., <u>et al</u> .,	) Case No. 01-01139 (JKF) ) Jointly Administered
Debtors.	

# W. R. Grace Asbestos Personal Injury Questionnaire

YOU HAVE RECEIVED THIS QUESTIONNAIRE BECAUSE GRACE BELIEVES THAT YOU HAD SUED ONE OR MORE OF THE DEBTORS LISTED IN APPENDIX A ATTACHED TO THIS QUESTIONNAIRE BEFORE GRACE FILED FOR BANKRUPTCY ON APRIL 2, 2001 FOR AN ASBESTOS-RELATED PERSONAL INJURY OR WRONGFUL DEATH CLAIM, AND THAT CLAIM WAS NOT FULLY RESOLVED.

IF YOU HAVE SUCH A CLAIM, YOU MUST COMPLETE AND SUBMIT THIS QUESTIONNAIRE BY JANUARY 12, 2006 TO RUST CONSULTING, INC., THE CLAIMS PROCESSING AGENT, AT ONE OF THE FOLLOWING ADDRESSES:

# IF SENT BY U.S. MAIL

RUST CONSULTING, INC. CLAIMS PROCESSING AGENT RE: W.R. GRACE & CO. BANKRUPTCY P.O. BOX 1620 FARIBAULT, MN 55021

IF SENT BY FEDERAL EXPRESS, UNITED PARCEL SERVICE, OR A SIMILAR HAND DELIVERY SERVICE

RUST CONSULTING, INC. CLAIMS PROCESSING AGENT RE: W.R. GRACE & CO. BANKRUPTCY 201 S. LYNDALE AVE. FARIBAULT, MN 55021

A QUESTIONNAIRE (AND ANY AMENDMENTS OR ADDITIONAL DOCUMENTS IN SUPPORT OF THE QUESTIONNAIRE) WILL <u>NOT</u> BE CONSIDERED UNLESS RECEIVED BY RUST CONSULTING, INC. BY JANUARY 12, 2006.

THIS QUESTIONNAIRE IS AN OFFICIAL DOCUMENT APPROVED BY THE COURT IN CONNECTION WITH ESTIMATING GRACE'S ASBESTOS-RELATED PERSONAL INJURY AND WRONGFUL DEATH CLAIMS AS A WHOLE. THE QUESTIONNAIRE IS BEING USED BY W. R. GRACE AS A MEANS TO SEEK INFORMATION ABOUT YOUR ASBESTOS CLAIM. BY TIMELY RETURNING THE QUESTIONNAIRE AS COMPLETELY AND ACCURATELY AS POSSIBLE, GRACE, THE OFFICIAL COMMITTEES, AND THE FUTURE CLAIMANTS REPRESENTATIVE WILL SEEK TO PRIORITIZE THE PROCESSING OF YOUR CLAIM UNDER ANY TRUST DISTRIBUTION PROCEDURES APPROVED AS PART OF A PLAN OF REORGANIZATION.

THE COURT HAS ORDERED THAT, AS PART OF THE DISCOVERY PROCESS, ALL HOLDERS OF PREPETITION ASBESTOS PERSONAL INJURY CLAIMS MUST COMPLETE AND RETURN THIS QUESTIONNAIRE. THUS, FAILURE TO TIMELY RETURN THE QUESTIONNAIRE AS COMPLETELY AND ACCURATELY AS POSSIBLE MAY RESULT IN SANCTIONS AND/OR OTHER RELIEF AVAILABLE UNDER APPLICABLE FEDERAL RULES.

BECAUSE YOUR CLAIM WILL BE EVALUATED IN ACCORDANCE WITH THE TRUST DISTRIBUTION PROCEDURES APPROVED AS PART OF A PLAN OF REORGANIZATION, COMPLETION OF THIS QUESTIONNAIRE DOES NOT MEAN THAT YOUR CLAIM WILL EITHER BE ALLOWED OR PAID. TO THE EXTENT YOU ATTACH TO THIS QUESTIONNAIRE DOCUMENTS ALSO NEEDED BY THE TRUST TO PROCESS YOUR CLAIM, SUCH DOCUMENTS WILL BE PROVIDED TO THE TRUST AND YOU WILL NOT NEED TO RESUBMIT THEM.

### INSTRUCTIONS

This Questionnaire refers to any lawsuit that you filed before April 2, 2001 for an "asbestos-related wh grace Pio 17400-0004 wrongful death claim." This term is intended to cover any lawsuit alleging any claim for personal interval of that relates to: (a) exposure to any products or materials containing asbestos that were manufactured, sold, supplied, produced, specified, selected, distributed or in any way marketed by one or more of the Debtors (or any of their respective past or present affiliates), or (b) exposure to vermiculite mined, milled or processed by the Debtors (or any of their respective past or present affiliates, any of the predecessors of any of the Debtors or any of their predecessors' respective past or present affiliates). It includes claims in the nature of or sounding in tort, or under contract, warranty, guarantee, contribution, joint and several liability, subrogation, reimbursement, or indemnity, or any other theory of law or equity, or admiralty for, relating to, or arising out of, resulting from, or attributable to, directly or indirectly, death, bodily injury, sickness, disease, or other personal injuries or other damages caused, or allegedly caused, directly or indirectly, and arising or allegedly arising, directly or indirectly, from acts or omissions of one or more of the Debtors. It includes all such claims, debts, obligations or liabilities for compensatory damages such as loss of consortium, personal or bodily injury (whether physical, emotional or otherwise), wrongful death, survivorship, proximate, consequential, general, special, and punitive damages.

2. Your Questionnaire will be deemed filed only when it has been received by Rust Consulting Inc., the Claims Processing Agent, via U.S. Mail, Federal Express, United Parcel Service or a similar hand delivery service. A Questionnaire that is submitted by facsimile, telecopy or other electronic transmission will not be accepted and will not be deemed filed.

Do not send any Questionnaire to the Debtors, counsel for the Debtors, the Future Claimants Representative, the Official Committee of Unsecured Creditors, the Official Committee of Asbestos Personal Injury Claimants, the Official Committee of Asbestos Property Damage Claimants, the Official Committee of Equity Security Holders, or such Committees' counsel. Questionnaires that are filed with or sent to anyone other than Rust Consulting, Inc. will be deemed not to have been submitted, and such Questionnaires will not be considered.

- 3. Your completed Questionnaire must (i) be written in English, and (ii) attach relevant supporting materials as instructed further below.
- 4. All holders of claims described on page i (and as described in further detail in Instruction A (1) above) are required to file this Questionnaire by Jan. 12, 2006. Your Questionnaire will be used in connection with the estimation hearing to be conducted by the Court pursuant to the Estimation Procedures Order (a copy of which is attached as Appendix B).
- Any subsequent amendment to the Questionnaire will not be considered for any purpose unless received by Jan. 12, 2006.

### B. PART I - Identity of Injured Person and Legal Counsel

Respond to all applicable questions. If you are represented by a lawyer, then in Part I (b), please provide your lawyer's name and the name, telephone number and address of his/her firm. If you are represented by a lawyer, he/she must assist in the completion of this Questionnaire. Also, if you would prefer that the Debtors send any additional materials only to your lawyer, instead of sending such materials to you, then check the box indicating this in Part I (b).

All references to "you" or the like in Parts I through X shall mean the injured person. If the injured person is deceased, then the executor of the person's will (or similar estate representative) must complete this Questionnaire.

## C. PART II -- Asbestos-Related Condition(s)

Please indicate all asbestos-related medical conditions for which you have been diagnosed. To complete questions related to injuries, medical diagnoses, and/or conditions, please use the following categories of customarily diagnosed conditions:

Mesothelioma

A. <u>GENERAL</u>

- Asbestos-Related Lung Cancer
- Other Cancer (colon, laryngeal, esophageal, pharyngeal, or stomach)
- Clinically Severe Asbestosis
- Asbestosis
- Other Asbestos Disease

If you have been diagnosed with multiple conditions and/or if you received diagnoses and diagnostic tests relating to the same condition by multiple doctors, please complete a separate Part II for each initial diagnosis and any previous or subsequent diagnoses or diagnostic tests that change or conflict with the initial diagnosis. For your convenience, additional copies of Part II are attached as Appendix C to this Questionnaire.

Supporting Documents for Diagnosis: This Questionnaire must be accompanied by copies, with access to originals upon request, of any and all documents you, your counsel, or your doctors have or subsequently obtain that support or conflict with your diagnosis.

X-rays and B-reads: Please attach all x-ray readings and reports. You may, but are not required to, attach chest x-rays. The court, however, has ruled that Grace may seek access to chest x-rays upon request.

Pulmonary Function Tests: Please attach all pulmonary function test results, including the actual raw data and all spirometric tracings, on which the results are based.

D. PART III - Direct Exposure to Grace Asbestos-Containing Products

In Part III, please provide the requested information for the job and site at which you WR GRACE PIG 017400-0005 asbestos-containing products. Indicate the dates of exposure to each Grace asbestos-containing products. was a result of your employment, use the list of occupation and industry codes below to indicate your occupation and the industry in which you worked at each site. If you allege exposure to Grace asbestos-containing products at multiple sites, the Court has ordered that you must complete a separate Part III for each site. For your convenience, additional copies of Part III are attached as Appendix D to this Questionnaire.

Attach copies of any and all documents establishing that exposure to Grace asbestos-containing products had a substantial causal role in the development of the disease.

# Occupation Codes

- 01. Air conditioning and heating installer/maintenance
- 02. Asbestos miner
- 03. Asbestos plant worker/asbestos manufacturing worker
- 04. Asbestos removal/abatement
- 05. Asbestos sprayer/spray gun mechanic
- 06. Assembly line/factory/plant worker
- 07. Auto mechanic/bodywork/brake repairman
- 08. Boilermaker
- 09. Boiler repairman
- 10. Boiler worker/cleaner/inspector/engineer/installer
- 11. Building maintenance/building superintendent
- 12. Brake manufacturer/installer
- 13. Brick mason/layer/hod carrier
- 14. Burner operator
- 15. Carpenter/woodworker/cabinetmaker
- 16. Chipper
- 17. Clerical/office worker
- 18. Construction general
- 19. Custodian/janitor in office/residential building
- 20. Custodian/janitor in plant/manufacturing facility
- 21. Electrician/inspector/worker
- 22. Engineer
- 23. Firefighter
- 24. Fireman
- 25. Flooring installer/tile installer/tile mechanic
- 26. Foundry worker
- 27. Furnace worker/repairman/installer
- 28. Glass worker
- 29. Heavy equipment operator (includes truck, forklift, & crane)59. Other
- 30. Insulator

- 31. Iron worker
- 32. Joiner
- 33. Laborer
- 34. Longshoreman
- 35. Machinist/machine operator
- 36. Millwright/mill worker
- 37. Mixer/bagger
- 38. Non-asbestos miner
- 39. Non-occupational/residential
- 40. Painter
- (41) Pipefitter
- 42. Plasterer
- 43. Plumber install/repair
- 44. Power plant operator
- 45. Professional (e.g., accountant, architect, physician)
- 46, Railroad worker/carman/brakeman/machinist/conductor
- (47) Refinery worker
- (48) Remover/installer of gaskets
- 49. Rigger/stevedore/seaman
- 50. Rubber/tire worker
- 51. Sandblaster
- 52. Sheet metal worker/sheet metal mechanic
- 53. Shipfitter/shipwright/ship builder
- 54. Shipyard worker (md. repair, maintenance)
- (55) Steamfitter
- 56. Steelworker
- 57. Warehouse worker
- 58. Welder/blacksmith

### Industry Codes

- 001. Asbestos abatement/removal
- 002. Aerospace/aviation
- 100. Asbestos mining
- 101. Automotive
- 102. Chemical
- 103. Construction trades
- 104. Iron/steel
- 105. Longshore
- 106. Maritime
- 107. Military (other than U.S. Navy)
- Non-asbestos products manufacturing

- 109. Petrochemical
- 110. Railroad
- 111. Shipyard-construction/repair
- 112. Textile
- 113. Tire/rubber
- (14) U.S. Navy
- 115. Utilities
- 116. Grace asbestos manufacture or milling
- 117. Non-Grace asbestos manufacture or milling
- 118. Other

# E. PART IV - Indirect Exposure to Grace Asbestos-Containing Products

In Part IV, please provide the information requested for any injury alleged to have been caused by expression of the provide the information requested for any injury alleged to have been caused by expression with the provided the information requested for any injury alleged to have been caused by expression with the provided the information requested for any injury alleged to have been caused by expression with the provided the information requested for any injury alleged to have been caused by expression with the provided the information requested for any injury alleged to have been caused by expression with the provided the information requested for any injury alleged to have been caused by expression with the provided the information requested for any injury alleged to have been caused by expression with the provided the information requested for any injury alleged to have been caused by expression with the provided the information requested for any injury alleged to have been caused by expression with the provided the information requested for any injury alleged to have been caused by expression with the provided the information requested for any injury alleged to have been caused by expression with the provided the asbestos-containing products through contact/proximity with another injured person. If you allege e contact/proximity with multiple injured persons, please complete a separate Part IV for each injured person. For your convenience, additional copies of Part IV are attached as Appendix E to this Questionnaire.



F. PART V - Exposure to Non-Grace Asbestos-Containing Products

In Part V, please provide the requested information for each party against which you have filed a lawsuit and/or claim alleging exposure to asbestos-containing products other than Grace products. If you filed such lawsuits and/or claims against multiple parties, the Court has ordered that you must complete a separate Part V for each party. If exposure was in connection with your employment, use the list of occupation and industry codes in Part III to indicate your occupation and the industry in which you worked. For your convenience, additional copies of Part V are attached as Appendix F to this Questionnaire.

# G. PART VI -- Employment History

In Part VI, please provide the information requested for each industrial job you have held, other than jobs already listed in Parts III or V. Use the list of occupation and industry codes in the instructions to Part III to indicate your occupation and the industry in which you worked for each job. Please use the copy of Part VI attached as Appendix G to this Questionnaire if additional space is needed.

# H. PART VII - Litigation and Claims Regarding Asbestos and/or Silica

In Part VII, please describe any lawsuits and/or claims that were filed by you or on your behalf regarding asbestos or silica.

# I. PART VIII -- Claims by Dependents or Related Persons

Part VIII is to be completed only by dependents or related persons (such as spouse or child) of an injured person who sued the Debtors before April 2, 2001 for an asbestos-related personal injury or wrongful death claim against Grace not involving physical injury to him-/herself on account of his/her own exposure. One example of such a claim would be a claim for loss of consortium. If you are asserting such a claim, complete the entire Questionnaire, providing all information and documentation regarding the injured person.

# J. PART IX - Supporting Documentation

In Part IX, please mark the boxes next to each type of document that you are submitting with this Questionnaire. As indicated in the instructions to Parts II and III, this Questionnaire must be accompanied by copies, with access to originals upon request, of any and all documents you, your counsel, or your doctors have or subsequently obtain that (a) support or conflict with your diagnosis and/or (b) establish exposure to Grace asbestos-containing products as having a substantial causal role in the development of the medical diagnoses, and/or conditions claimed. Original documents provided to Grace will be returned within a reasonable time after its professionals and experts have reviewed the documents.

Grace will reimburse your reasonable expenses incurred in providing (a) copies of depositions you have given in lawsuits in which Grace was not a party and/or (b) any documents you have previously provided to Grace in prior litigation. Please indicate the documents for which you are seeking reimbursement and attach a receipt for such cost.

# K. PART X -- Attestation that Information is True, Accurate and Complete

By signing Part X, you, the injured person, are attesting and swearing, under penalty of perjury, that, to the best of your knowledge, all of the information in this Questionnaire is true, accurate and complete. If the injured person is deceased, then the executor of the person's will (or similar estate representative) must complete and sign Part X on behalf of the injured

The legal representative of the injured person must complete and sign Part X where indicated.

	PART DENHIPO	- ENJURED PERS	on and decay.	COUNSEL	
a. GENI	ERAL INFORMATION				WR GRACE PIO 017489-0
1. Name	of Claimant: First	. M <b>i</b>	Last	2. Gender	: Male □ Female
3. Race (	for purposes of evaluating Pulmonar	y Function Test re	sults):		White/Caucasian African American
4. Last Fo	ur Digits of Social Security Number:		5. Birth Dat		Other
6. Mailing	Address:	City	Stat	e/Province	Zip/Postal Code
	YER'S NAME AND FIRM				
1. Name	of Lawyer: Scott W. Wi	ያርት ጎ			
3. Mailin  4. Law F  Ch	of Law Firm With Which Lawyer is g Address of Firm: 534 E. Lamo Address irm's Telephone Number or Lawyer teck this box if you would like the Debru of sending such materials to you.	c Blud # 200 City 's Direct Line:	Arlington Sta		
1. Is the in	SE OF DEATH (IF APPLICABLE)  njured person living or deceased?  nsed, date of death:				iving Deceased
2. If the in the follo	njured person is deceased, then attac owing: nary Cause of Death (as stated in the atributing Cause of Death (as stated in	ch a copy of the de Death Certificate)  n the Death Certifi	ath certification to :cate):		nnaire and complete
instructions diagnostic and any pr	pox next to the conditions with which to this Questionnaire. If you have been tests relating to the same condition by revious or subsequent diagnoses or diagnoses or diagnoses of Part II are attached.	h you have been den diagnosed with nultiple doctors, pleagnostic tests that o	nultiple conditions a ase complete a sepa hange or conflict w	ide all inform nd/or if you re rate Part II for vith the initial	eceived diagnoses and each initial diagnosis
	check the box next to the condition b				
XAst XOth a. M	pestos-Related Lung Cancer pestosis per Asbestos Disease pesothelioma: If alleging Mesothelic pllowing (check all that apply):	Clinically	er (cancer not relate Severe Asbestosis		cer or mesothelioma)

ECD JUL 12 2006

diagnosis and documentation supporting exposure to Grace asbestos-containing products having a substantial

diagnosis from a pathologist certified by the American Board of Pathology

causal role in the development of the condition

other (please specify):

diagnosis from a second pathologist certified by the American Board of Pathology

<u></u>		PART II: ASBESTOS RELATED CONDITION(S) (Continued)
b.		pestos-Related Lung Cancer: If alleging Asbestos-Related Lung Cancer, were you diagno WR GRACE PIQ 017400-02 cancer based on the following (check all that apply):
		findings by a pathologist certified by the American Board of Pathology
		evidence of asbestosis based on a chest x-ray reading of at least 1/1 on the ILO grade scale (a) conducted in compliance with the standards set forth in the International Labour Organization's 2000 International Classification of Radiographs of Pneumoconioses and (b) by a B-reader certified by the National Institute for Occupational Safety and Health
		evidence of asbestosis based on a chest x-ray reading of at least 1/1 on the ILO grade scale (a) conducted in compliance with the standards set forth in the International Labour Organization's 2000 International Classification of Radiographs of Pneumoconioses and (b) by a second B-reader certified by the National Institute for Occupational Safety and Health
		evidence of asbestosis determined by pathology
		evidence of asbestos-related nonmalignant disease based on a chest x-ray reading of at least 1/0 on the ILO grade scale (a) conducted in compliance with the standards set forth in the International Labour Organization's 2000 International Classification of Radiographs of Pneumoconioses and (b) by a B-reader certified by the National Institute for Occupational Safety and Health
		evidence of asbestos-related nonmalignant disease based on a chest x-ray reading of at least 1/0 on the ILO grade scale (a) conducted in compliance with the standards set forth in the International Labour Organization's 2000 International Classification of Radiographs of Pneumoconioses and (b) by a second B-reader certified by the National Institute for Occupational Safety and Health
F	Ĺ	diffuse pleural thickening as defined in the International Labour Organization's Guidelines for the Use of the ILO International Classification of Radiographs and Pneumoconioses (2000)
		a supporting medical diagnosis and supporting documentation establishing that exposure to Grace asbestos-containing products had a substantial causal role in the development of the lung cancer
		other (please specify):
c.	Oth	ner Cancer:
	(i)	If alleging Other Cancer, please mark the box(es) next to the applicable primary cancer(s) being alleged:
		colon pharyngeal esophageal laryngeal stomach cancer
		other, please specify:
	(ii)	Were you diagnosed with the above-indicated cancer based on the following (check all that apply):
		indings by a pathologist certified by the American Board of Pathology
	.•	evidence of asbestosis based on a chest x-ray reading of at least 1/1 on the ILO grade scale (a) conducted in compliance with the standards set forth in the International Labour Organization's 2000 International Classification of Radiographs of Pneumoconioses and (b) by a B-reader certified by the National Institute for Occupational Safety and Health
		evidence of asbestosis based on a chest x-ray reading of at least 1/1 on the ILO grade scale (a) conducted in compliance with the standards set forth in the International Labour Organization's 2000 International Classification of Radiographs of Pneumoconioses and (b) by a second B-reader certified by the National Institute for Occupational Safety and Health
		evidence of asbestosis determined by pathology
		a supporting medical diagnosis and supporting documentation establishing that exposure to Grace asbestos-containing products had a substantial causal role in the development of the cancer
		other (please specify):

# PARTIL ASBESTOS RELATED CONDITION(S) (Continued)

***	MILLIED (8)	*********	un arma tidiff	P15 1 101 1 1 1 1

	d.	Clin (che	nically Severe Asbestosis: If alleging Clinically Severe Asbestosis, was your diagnost WR GRACE PIQ 017400-0009 eck all that apply):
			diagnosis of a pulmonologist or internist certified by the American Board of Internal Medicine
			a chest x-ray reading of at least 2/1 on the ILO grade scale (a) conducted in compliance with the standards set forth in the International Labour Organization's 2000 International Classification of Radiographs of Pneumoconioses and (b) by a B-reader certified by the National Institute for Occupational Safety and Health
		_	a chest x-ray reading of at least 2/1 on the ILO grade scale (a) conducted in compliance with the standards set forth in the International Labour Organization's 2000 International Classification of Radiographs of Pneumoconioses and (b) by a second B-reader certified by the National Institute for Occupational Safety and Health
un da	محص	Z	asbestosis determined by pathology
un} "s			a pulmonary function test, conducted in accordance with the standards set forth in the American Thoracic Society's Lung Function Testing; Selection of Reference Values and Interpretive Strategies, demonstrating total lung capacity less than 65% predicted
			a pulmonary function test, conducted in accordance with the standards set forth in the American Thoracic Society's Lung Function Testing; Selection of Reference Values and Interpretive Strategies, demonstrating forced vital capacity less than 65% predicted and a FEV1/FVC ratio greater than or equal to 65% predicted
			a supporting medical diagnosis and supporting documentation establishing that exposure to Grace asbestos-containing products had a substantial causal role in the development of the asbestosis
			other (please specify):
	e.	Asi	pestosis: If alleging Asbestosis, was your diagnosis based on the following (check all that apply):
			diagnosis of a pulmonologist or internist certified by the American Board of Internal Medicine
			a chest x-ray reading conducted in compliance with the standards set forth in the International Labour Organization's 2000 International Classification of Radiographs of Pneumoconioses by a B-reader certified by the National Institute for Occupational Safety and Health, with one of the following: (i) at least 1/0 on the ILO grade scale, or (ii) diffuse pleural thickening as defined in the ILO's Guidelines for the Use of the ILO International Classification of Radiographs and Pneumoconioses (2000)
			a chest x-ray reading conducted in compliance with the standards set forth in the International Labour Organization's 2000 International Classification of Radiographs of Pneumoconioses by a second B-reader certified by the National Institute for Occupational Safety and Health, with one of the following: (i) at least 1/0 on the ILO grade scale, or (ii) diffuse pleural thickening as defined in the ILO's Guidelines for the Use of the ILO International Classification of Radiographs and Pneumoconioses (2000)
			asbestosis determined by pathology
	-	<b>A</b>	_a pulmonary function test, conducted in accordance with the standards set forth in the American Thoracic Society's Lung Function Testing; Selection of Reference Values and Interpretive Strategies, demonstrating a FEVI/FVC ratio greater than or equal to 65% predicted with either (a) total lung capacity less than 80% predicted or (b) forced vital capacity less than 80% predicted
			a supporting medical diagnosis and supporting documentation establishing that exposure to Grace
			asbestos-containing products had a substantial causal role in the development of the asbestosis

# PART II: ASBESTOS-RELATED CONDITION(S) (Continued)

WR GRACE PID 017410-001

	the Aspestos Disease: If alleging any aspestos-related injuries, medical diagnoses, and/or conditions other than se above, was your diagnosis based on the following (check all that apply):
	diagnosis of a pulmonologist or internist certified by the American Board of Internal Medicine
	diagnosis determined by pathology
	a chest x-ray reading conducted in compliance with the standards set forth in the International Labour Organization's 2000 International Classification of Radiographs of Pneumoconioses by a B-reader certified by the National Institute for Occupational Safety and Health, with one of the following: (i) at least 1/0 on the ILO grade scale, or (ii) diffuse pleural thickening as defined in the ILO's Guidelines for the Use of the ILO International Classification of Radiographs and Pneumoconioses (2000)
	a chest x-ray reading conducted in compliance with the standards set forth in the International Labour Organization's 2000 International Classification of Radiographs of Pneumoconioses by a second B-reader certified by the National Institute for Occupational Safety and Health, with one of the following: (i) at least 1/0 on the ILO grade scale, or (ii) diffuse pleural thickening as defined in the ILO's Guidelines for the Use of the ILO International Classification of Radiographs and Pneumoconioses (2000)
区	a chest x-ray reading other than those described above
Ď	a pulmonary function test, conducted in accordance with the standards set forth in the American Thoracic Society's Lung Function Testing; Selection of Reference Values and Interpretive Strategies, demonstrating a FEVI/FVC ratio greater than or equal to 65% predicted with either (a) total lung capacity less than 80% predicted or (b) forced vital capacity less than 80% predicted
	a pulmonary function test other than that discussed above
	a supporting medical diagnosis and supporting documentation establishing that exposure to Grace asbestos-containing products had a substantial causal role in the development of the condition
	a CT Scan or similar testing
	a diagnosis other than those above
	other (please specify):

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In	formation Regarding Diagnosis WR GRACE F	10
D	ate of Diagnosis: See Attached Exhibit A	
	iagnosing Doctor's Name: See Attached Exhibit A	
•	iagnosing Doctor's Specialty: See Attached Exhibit A	
	ingnosing Doctor's Mailing Address: See Attached Exhibit A	
v	Address .	
C	ity State/Province Zip/Postal	C
	iagnosing Doctor's Daytime Telephone Number:	-
V	Vith respect to your relationship to the diagnosing doctor, check all applicable boxes:	
TX	Vas the diagnosing doctor your personal physician?	
77	Vas the diagnosing doctor paid for the diagnostic services that he/she performed?	
	Tyes, please indicate who paid for the services performed:	_
Г	id you retain counsel in order to receive any of the services performed by the diagnosing doctor? Yes	C
ν	Vas the diagnosing doctor referred to you by counsel?	
A	tre you aware of any relationship between the diagnosing doctor and your legal counsel?	Ľ
	fyes, please explain: N/A	
-		_
ø	Was the diagnosing doctor certified as a pulmonologist or internist by the American Board of Internal M the time of the diagnosis?	Ŀ
7	Was the diagnosing doctor certified as a pathologist by the American Board of Pathology at the time	ot
ć	liagnosis?13	L
ć	Was the diagnosing doctor provided with your complete occupational, medical and smoking history p	
}	Oid the diagnosing doctor perform a physical examination?	Ŀ
}	Do you currently use tobacco products?	L
)	Have you ever used tobacco products?	L
	If answer to either question is yes, please indicate whether you have regularly used any of the following a products and the dates and frequency with which such products were used:	to
- [	Cigarettes Packs Per Day (half pack = .5) Start Year End Year	
Ī	Cigars Cigars Per Day Start Year End Year	_
(	Tother Tehesca Products please specify (e.g., chewing tobacco):	
•	Amount Per Day Start Year End Year	
	Have you ever been diagnosed with chronic obstructive pulmonary disease ("COPD")?	1
	If yes, please attach all documents regarding such diagnosis and explain the nature of the diagnosis:	
	g yes, premie autori ari are entre a grand a g	

PARITUE ASPESTOS RELATED CONDITION SMCORDINE		
Information Regarding Chest X-Ray Reading See Attached Exhibit	- A WR GRAC	E PIQ 017
Date of Reading:/ LO score:		
Name of Reader: See ##################################		
Reader's Daytime Telephone Number: See Attached Exhibit A		
Reader's Mailing Address: See Attached Exhibit A		
Address		<del></del>
City State/Province	Zip/Postal Co	nde.
With respect to your relationship to the reader, check all applicable boxes:	zapri com ce	<b>760</b>
Was the reader paid for the services that he/she performed		No
If yes, please indicate who paid for the services performed:	, <u>,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,</u>	
Did you retain counsel in order to receive any of the services performed by the reader?		No
Was the reader referred to you by counsel?	. — —	
Are you aware of any relationship between the reader and your legal counsel?	Yes 🔀	No
If yes, please explain:N/A		
Was the reader certified by the National Institute for Occupational Safety and Health	at the time of the readin	g?
***************************************		No
If the reader is not a certified B-reader, please describe the reader's occupation, special which the reading was made:NA	ulty, and the method thro	ugh
See Attached Exhib	I+ A	
Information Regarding Pulmonary Function Test:	·—/——/——	- <del></del>
List your height in feet and inches when test given: See Attached Exhibit 1	ftinc	ches
List your weight in pounds when test given: See Attacked Exhibit A		
		lbs
Total Lung Capacity (TLC): See Attached Exhibit A	% of predic	cted
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	PARTIL: ASBESTOS RELATED CONDITION(S) (Continued)	
	With respect to your relationship to the doctor or clinician who performed the pulmonary funcapplicable boxes:	R GRACE PIO 017488-0013
	If the test was performed by a doctor, was the doctor your personal physician?	Yes No
	Was the testing doctor and/or clinician paid for the services that he/she performed?	
	If yes, please indicate who paid for the services performed:	
	Did you retain counsel in order to receive any of the services performed by the testing doctor or clinician	?□ Yes ÆÎ No
	Was the testing doctor or clinician referred to you by counsel?	
	Are you aware of any relationship between either the doctor or clinician and your legal counsel?	
	If yes, please explain:	
	Was the testing doctor certified as a pulmonologist or internist by the American Board of Intern the time of the pulmonary function test?	al Medicine at X Yes No
	With respect to your relationship to the doctor interpreting the results of the pulmonary functapplicable boxes:	
	Was the doctor your personal physician?	Yes No
	Was the doctor paid for the services that he/she performed?	Yes No
	If yes, please indicate who paid for the services performed: _	
	Did you retain counsel in order to receive any of the services performed by the doctor?	Yes No
	Was the doctor referred to you by counsel?	
	Are you aware of any relationship between the doctor and your legal counsel?	Yes 🙉 No
	If yes, please explain \\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	
· 6.	Was the doctor interpreting the pulmonary function test results certified as a pulmonologist o American Board of Internal Medicine at the time the test results were reviewed?	r internist by the Yes No
	Date of Pathology Report:/	1 .
	Findings:	
	Name of Doctor Issuing Report:	
on		
	Doctor's Specialty:	
	Doctor's Mailing Address: Address	
	City State/Province	F: 10 - 1 0 1
	Doctor's Daytime Telephone Number:	Zip/Postal Code
	With respect to your relationship to the doctor issuing the pathology report, check all applicable  Was the doctor your personal physician?	
	Was the doctor paid for the services that he/she performed?	
	If yes, please indicate who paid for the services performed:	
	Did you retain counsel in order to receive any of the services performed by the doctor?	
	Was the doctor referred to you by counsel?	
	Are you aware of any relationship between the doctor and your legal counsel?	
	If yes, please explain:	
	Was the doctor certified as a pathologist by the American Board of Pathology at the time of the d	iagnosis?
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7.	•	BESTOS-RELATED CONDITION(S).(Continue , have you received medical treatment from a do	
	If yes, please complete the following: Name of Treating Doctor:	······································	•
1/00	Treating Doctor's Specialty:  Treating Doctor's Mailing Address:	Address	
	Was the doctor paid for the services of If yes, please indicate who paid for the		
•	Did you retain counsel in order to rec	eive any of the services performed by the doctor	Yes No

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# PART III. DIRBOT EXPOSURE TO GRACE ASBESTOS-CONTAINING ERODUCTS

Please complete the chart below for each site at which you allege exposure to Grace asbestos-containing products. If you allege exposure at multiple sites, the Court has ordered that you must complete a separate chart for each site. For your convenience, additional copies of Part III are attached as Appendix D to this Questionnaire.

If exposure was in connection with your employment, use the list of occupation and industry codes in the Instructions to Part III to indicate your occupation and the industry in which you worked. In the "Nature of Exposure" column, for each job listed, please indicate the letter(s) corresponding to whether you were any of the following during your exposure:

- (a) A worker who personally mixed Grace asbestos-containing products
- (b) A worker who personally removed or cut Grace asbestos-containing products
- (c) A worker who personally installed Grace asbestos-containing products
- (d) A worker at a site where Grace asbestos-containing products were being installed, mixed, removed or cut by others
- A worker in a space where Grace asbestos-containing products were being installed, mixed, removed or cut by others **ම**
- If other, please specify. Œ

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	Naturefof.Es	Transcop	Shee Ba 340	of Time	)			
Location: Bus & Texas Crty TX.  n you were a member during your employment: Local 211	ndustry Mas-expositre due to working in orthogode.  Gode around areas where product was being food.  Installed interdirection or out.  If the blease indicate your regular procify.  Broaunity to such areas.	Traslitation & Suit Burner Monacolo	Polling Ketter					
Location: Buy Ly TeXAS Unions of which you were a member during your employment:	Dates and Frequency Cocupation of Exposure (Code	1452-1982 30x200 Tancah	Tin Smilton	1943-1946 Novy Seran				6
of Exposure: Site Name: Mprad Court Cherrical Site Type: A Business Site Owner: Employer During Exposure: Maradoxto Drew.	Basistor Aroduct(s) Identification of Each Grace Product							
Site of Exposure: Site Name: 77/ Site Type: 1   Employer During		Job 1 Description:	Job 2 Description:	Job 3 Description:	Job 4 Description:	Job 5 Description:	Job 6 Description:	The state of the s

	PART IV: INDIRECT EXPOSURE TO GRACE ASBESTOS CONTAINING PRODUCT
1.	Are you asserting an injury caused by exposure to Grace asbestos-containing products through contact/proximity with another injured person? If It was along in Piping Basista. Ves \( \text{No} \)
	If yes, complete questions 2 through 10 of this section for each injured person through which you allege exposure to this Questionnaire.  If yes, complete questions 2 through 10 of this section for each injured person through which you allege exposure to this Questionnaire.
2.	
	Name of Other Injured Person: HE Baker Engulation Condon [VI) (1)
	Last Four Digits of Social Security Number:
3.	
4.	Nature of Other Injured Person's Exposure to Grace Asbestos-Containing Products:
5.	Dates Other Injured Person was Exposed to Grace Asbestos-Containing Products:    To:
6.	Other Injured Person's Basis for Identification of Asbestos-Containing Product as Grace Product:
7.	Has the Other Injured Person filed a lawsuit related to his/her exposure? Yes No
	If yes, please provide caption, case number, file date, and court name for the lawrette
	Caption:
	Case Number:File Date://
	Court Name:
8.	Nature of Your Own Exposure to Grace Asbestos-Containing Product:
9.	Dates of Your Own Exposure to Grace Asbestos-Containing Product:  Pand Remember From:/ To:/
10.	Your Basis for Identification of Asbestos-Containing Product as Grace Product:

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# PART V. EXPOSURE TO NON-GRACE ASBESTOS-CONTAINING PRODUCTS

Please complete the chart below for each party against which you have filed a lawsuit and/or claim alleging exposure to asbestos-containing products other than Grace products. If you filed such lawsuits and/or claims against multiple parties, the Court has ordered that you must complete a separate chart for each party. For your convenience, additional copies of Part V are attached as Appendix F to this Questionnaire.

(d) A worker at a site where Non-Grace asbestos-containing products were being installed, mixed, removed If exposure was in connection with your employment, use the list of occupation and industry codes in the Instructions to Part III to indicate your occupation and the industry in which you worked. In the "Nature of Exposure" column, for each product listed, please indicate the letter(s) corresponding to whether you were any of the following during your exposure:

- (a) A worker who personally mixed Non-Grace asbestos-containing products
  - (b) A worker who personally removed or cut Non-Grace asbestos-containing
- (c) A worker who personally installed Non-Grace asbestos-containing products

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S Nature of Exposure																		
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Occupatio																		
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Claim was I	Job 1 Description:		Job 2 Description:		Job 3 Description:	Job 1 Description:		Job 2 Description:		Job 3 Description:		Job 1 Description:	•	Job 2 Description:		Job 3 Description:		
Party Against which Lawsuit or Claim was Filed:				1												Annual and a second		
ty Against which Law	sposure 1	ië:	.	State:	ier:	Site of Exposure 2	je:		State:	ler:		Site of Exposure 3	le:		State:	ner:		
Party Aga	Site of Exposure 1	Site Name:	Address:	City and State:	Site Owner:	 Site of E	Site Name:	Address:_	City and State:	Site Owner:		Site of E	Site Name:	Address:	City and State:	Site Owner:		

and the		PART VI. EVII	REOVINE	NUMBER	Yan in in		WR GRACE PIQ 017483-0018
including you Only include	ur current employmen	r V, please complete this t. For each job, include orked for at least one mo s needed.	your empl	loyer, location	of employmen	t, and dates of emplo	vment.
Occupation	Code: 41-55	If Code 59, specify:	<u>See</u> f	Hached	Exhibit "	<u>B</u>	
Industry Co	de;	If Code 118, specify:	See f	<del>Hached</del>	Exhibit	B :	<u> </u>
•	monsanto			Attached	Exhibit	B	·
Beginning of	f Employment: <u>/</u>	1.7 / 1952	· 	End of Emp	loyment: 1	_//	22
Location:	Tejas (2) Address	ety 3	See 1	9.Hacheol -	Exhibit:	B	
City Tex	les Oity			State/Province		Zip/Postal Code	 ;
Occupation	Code: 41- 55	If Code 59, specify:	See	Attached	Exhibit	B	
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Location:	Address	ensanto f	lan	<i>T</i>	-	Job and	Tenomett July 52
City Rep	as City		S	tate/Province		Zip/Postal Code	
Occupation	Code: 41-55	If Code 59, specify:	See A	Hached	Exhibit "	B	
Industry Co		If Code 118, specify:					-
Employer:	Tin Sme	efec y					<del></del>
Location:	Employment: 7  Tenfar Ca  Address	ty Peras	·	End of Empl	oyment:	1 - 1 195	-1 & B.P. J. Aseans
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City TeX	as out		Stat	e/Province		Zip/Postal Code	
Occupation (	Code: 455	If Code 59, specify:	See F	Hached	Exhibit I	3	
Industry Co	ie:	If Code 118, specify:					
Employer:							
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	PART VIII LIDIGATION AND CLATVISITE CARDING ASBESTOS AND OR SILT
a.	LITIGATION WR GRACE PIQ 01740
1.	Have you ever been a plaintiff in a lawsuit regarding asbestos or silica?
2,	Please provide the caption, case number, file date, and court name for the lawsuit you filed:  Caption: See Attached Exhibit C
	Case Number: See Attached Exhibit C File Date: 07/29/1998  Court Name: See Attached Exhibit C
3.	Was Grace a defendant in the lawsuit?
4.	Was the lawsuit dismissed against any defendant?
	If yes, please provide the basis for dismissal of the lawsuit against each defendant:  See General Objections and further objection is made
	in that answer Calls for attorney work-product.
5.	Has a judgment or verdict been entered?
6.	Was a settlement agreement reached in this lawsuit?
7.	Were you deposed in this lawsuit?
b	CLAIMS
	Have you ever asserted a claim regarding asbestos and/or silica, including but not limited to a claim against an asbestos trust (other than a formal lawsuit in court)?
	Date the claim was submitted: See General Objections
	Person or entity against whom the claim was submitted: See General Objections
4.	Description of claim: See General Objections
5.	Was claim settled?Yes No
6.	Please indicate settlement amount:
7.	Was the claim dismissed or otherwise disallowed or not honored?

# EDACTED

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PART VIII: CLAIMS BYD	EPENDENTS OR RELATED PERSONS WR GRACE PIO O
Name of Dependent or Related Person:	Gender: Male Female
Last Four Digits of Social Security Number:	
Financially Dependent:	
Relationship to Injured Party: M Spouse Child	J Other If other, please specify Work
Mailing Address:	
- Address	
City	State/Province Zip/Postal Code
Daytime Telephone number:	2.pr osia coge
PART IX: SUPPO	RTING DOCUMENTATION
Please use the checklists below to indicate which docume	ents you are submitting with this form.
Copies:  Medical records and/or report containing a diagnosis	• •
Lung function test results	X-ray reports/interpretations
Lung function test interpretations Pathology reports	CT scans
Supporting documentation of exposure to Grace	CT scan reports/interpretations Depositions from lawsuits indicated in Part VII
( asbestos-containing products	of this Questionnaire
Supporting documentation of other asbestos exposur	e Death Certification
Originals:	Companies de la companie de la compa
Medical records and/or report containing a diagnosis Lung function test results	Supporting documentation of other asbestos exposure X-rays
Lung function test interpretations	X-ray reports/interpretations
Pathology reports Supporting documentation of exposure to Grace	CT scans CT scan reports/interpretations
asbestos-containing products	Death Certification
Grace will reimburse your reasonable expenses incurred which Grace was not a party and/or (b) any documents indicate the documents for which you are seeking reimburs.	in providing (a) copies of depositions you have given in lawsuits in you have previously provided to Grace in prior litigation. Please rement and attach a receipt for such costs:
	VEORMATION IS TRUE AND ACCURATE
fraudulent Questionnaire is a fine of up to \$500,000 or im TO BE COMPLETED BY THE INJURED PERSON.	be accurate and truthful. This Questionnaire is an official court proceeding regarding your Claim. The penalty for presenting a prisonment for up to five years, or both. 18 U.S.C. §§ 152 & 3571.
Agendantine is true, accurate and complete. Con 11 FR	my knowledge, all of the foregoing information contained in this
Signature:	Date: <u>0</u> 2/16/2006
Please Print Name: REDACTE	D
TO DE COMDI ETED DU MYST * NO	
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of the icomplete.	nformation contained in this Questionnaire is true, accurate and
Signature:	
Please Print Name:	



# PHILLIP H. LUCAS, M. D.

RADIOLOGY • INTERNAL MEDICINE • NIOSH B-READER

220 Winged Foot Circle Jackson, Mississippi 39211 (601) 957-2262 • Fax (601) 957-6912

# REDACTED

PA and lateral chest radiographs dated 07/19/97 were evaluated for the presence and classification of asbestos related pneumoconiosis utilizing the 1980 ILO guidelines.

The film quality is 2 secondary to an artifact. The heart, mediastinum and pulmonary vasculature are normal. Irregular interstitial opacities are seen throughout both lungs, the size and shape of which are classified as t/t, and the profusion is 1/0. The pleural surfaces are unremarkable, and no other significant defects are found.

# **OPINION:**

Bilateral interstitial fibrotic changes consistent with asbestosis in a patient who has had an adequate exposure history and latent period.

Phillip H. Lucas, M. D.

PHL/al 08/08/97

EXHIBIT "A"



# TITCAC A C

PHILLIP H. LUCAS, M. D. RADIOLOGY • INTERNAL MEDICINE • NIOSH B-READER

220 Winged Foot Circle Jackson, Mississippi 39211 (601) 957-2262 • Fax (601) 957-6912

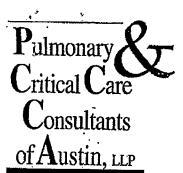
WORKER'S Social Security Number

TYPE OF READING

AXP

MONTH DAY YR

			- 1//
IA. DATE OF X-RAY IB. FILM QUALITY  MONTH PAY YR  217 / 19 917  1 2 3 U/R	if Not Grade 1 Give Reason; Outsport	IC. IS FILM COMP. NEGATIVE? YES Proceed to Section 5	LETELY Proceed to Section 2
2A. ANY PARENCHYMAL ABNORMALITIES CONSISTENT WITH PNEUMOCONIOSIS?		COMPLETE NO TO	PROCEED TO SECTION 1
2B. SMALL OPACITIES	a bhorusia.	2C. LARGE OPACI	TIES
PRIMARY SECONDARY  P S P S X X X X Y X Y X X X X X X X X X X X X	% % % % % % % % % % % % % % % % % % %	SIZE X A	PROCEED TO SECTION 3
3A. ANY PLEURAL ABNORMALITIES CONSISTENT WITH PNEUMOCONIOSIS?		OMPLETE 3, 3C and 3D NO	PROCEED TO SECTION 4
a. DIAPHRAGM (plaque)  SITE ORL IN PROFILE i. WIDTH ii. EXTENT OI 1 2 1 3	0 L IN O 1 1 2 1 3 FA	OL EXTENT  OLD EXT	PROCEED TO
4A. ANY OTHER ABNORMALITIES?		OMPLETE NO X	PROCEED TO SECTION 5
4B. OTHER SYMBOLS (OBLIGATORY)  O   ax   bu   ca   cn   co   cp   cv   di   ef   em	es   fr   ni   ho   i	d in ki lo: jpx ro (tb)	
Report items which may be of present clinical significance in this section.		Date Personal Ph	
4C. OTHER COMMENTS	,	7	
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water the same and		YES I NO	





DATE OF EXAM: 7/09/99

### DOWNTOWN OFFICE

Austin Doctors Building

1305 West 34th Street

**SUITE 400** 

**AUSTIN TX 78705** 

PHONE • 512/459 • 6599

Fax • 512/459 • 8496

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SETON NORTHWEST

11111 RESEARCH BLVD.

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JORDAN S. WEINGARTEN, MD, PA

MARK S. KLEPPER, MD, PA

PAUL H. HARFORD, MD, PA

KENNETH A. PERRET, MD, PA

### REDACTED

# PHYSICIAN: Dr. Cochrane, Family Practitioner

is a 74 year old gentleman who has a rare cough. When he does have the cough he brings up some white phlegm. He says that he wheezes occasionally. It is not a regular occurrence. He doesn't take any medicine for it. He can walk a mile on level ground easily and thinks he can go many more. He can go up stairs easily. He goes up three or four flights without stopping.

PAST LUNG DISEASE: He had pneumonia in '75, no other history of chronic lung disease.

**SMOKING HISTORY:** He smoked three or four cigarettes a day for about 13 years. He quit 30 years ago completely.

OCCUPATIONAL HISTORY: He was in the Navy from '43 to '46. From '46 to '52 he worked in a tin smelter casting tin. He worked as a pipe fitter. He says that there was a lot of insulated and covered pipe that he was exposed to. He says he did some maintenance work and repair work and this pipe covering was disturbed. He worked around a lot of very hot areas and believes there was asbestos in this environment but doesn't recall specific details. He did not wear a mask there. He didn't do any sandblasting there. He worked for Monsanto from '52 to '82 as a pipe fitter. He has used asbestos rope. He has unraveled it. He has mixed it with epoxy as a wrapping for caustic pipe packing. He has used asbestos gaskets. He has used fire blankets extensively. He has mixed up asbestos shorts with water to make a mud. He has used transite siding. He has drilled holes in it with a variety of different instruments. He was unemployed from '82 to '94. He occasionally wore a paper mask. He says it was not typical nor regular,

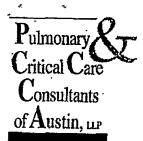
PAST MEDICAL HISTORY: He doesn't have any allergies to medications. He takes Captopril. He had a TURP in January of '98. He has hypertension and a histal hemia.

FAMILY HISTORY: A sister has breast cancer. Mother has diabetes and father has hypertension.

SOCIAL HISTORY: He has a beer now and then.

REVIEW OF SYSTEMS: He has indigestion. He has difficulty swallowing.

PHYSICAL EXAMINATION: Blood pressure is 140/90. Pulse 88 and regular. Respirations 12 and unlabored. Weight 183 lbs.





### REDACTED

### PAGE 2

**HEAD & NECK:** There is no JVD or adenopathy. Oropharynx is clear. Nose is clear. Ears are normal with normal TM's. No thyromegaly. Carotid upstrokes are full bilaterally without bruits.

CHEST: Breath sounds are clear and equal bilaterally. There are no wheezes or rales.

CARDIAC EXAM: Regular rate and rhythm with a normal S1 and S2.

**ABDOMEN:** Soft and nontender with normal bowel sounds. No hepatosplenomegaly or masses,

EXTREMITIES: No cyanosis, clubbing or edema.

NEUROLOGICAL: Alert and oriented times 3 and nonfocal.

His chest x-ray from today shows a good quality PA and lateral film. He has bilateral interstitial infiltrates of relatively low profusion on this radiograph composed of small and medium-sized irregular and rounded opacities. He has bilateral pleural plaque with in profile and en face components. There is a suggestion of pleural plaque on the left hemidiaphragm but this is not well seen, however. The lateral shows no additional abnormalities. His older x-ray is available for review. It is dated 7/18/97. This older x-ray shows bilateral interstitial infiltrates and in retrospect it does show the pleural plaque. It is more apparent on the left than the right. However, I do see the same changes. This confirms the presence of this abnormality.

Pulmonary function tests show normal flow rates, mild restriction, and normal diffusion when corrected for alveolar volume.

## **ASSESSMENT & PLAN:**

This is an elderly gentleman who has been exposed to asbestos in the work place over many years who has interstitial fibrosis due to asbestosis. He also has asbestos related pleural disease with bilateral pleural plaque as described. I have explained these findings to him as well as his future risk of progressive pulmonary fibrosis, pulmonary insufficiency, lung cancer, and other asbestos related malignancies. He understands and will follow-up with his physician on a regular basis.

Mark Klepper, M.D. MSK:ss

xc: Foster & Sear

# PULMONARY AND CRITICAL CARE CONSULTANTS OF A

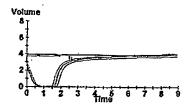
# **Pulmonary Function Analysis**

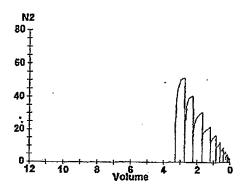
Date: 07/09/99

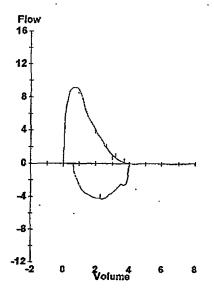
Name: ld:

Technician: M. CHESNUTT CCPT Physician: M. KLEPPER, M.D.

Age:	74	Height(in): 71	Weight(lb): 193			Gender: Male	Race: Caucasian
	Spirome	try	Ref .	Pre Meas	Pre % Ref		Post % Chg
	FVC	Liters	4.57	4.00	88		Jg
	FEV1	Liters	3.46	3.21	93		
	FEV1/FVC	%	76	80			•
	FEF25-75%	⊾ L/sec	2.99	3.16	106		
	PEF	L/sec	8.36	9.15	109		
	Lung Vol	lumes					
11/2/201	VC	Liters	4.57	4.00	88		
	IC	Liters	3.01	(3.83)	(127)		•
	ERV	Liters	1.51	(0.55)	(36)		
	FRC Dil	Liters	3.87	(1.56)	(40)		
	RV	Liters	2.58	(f.39)	(54)	•	
	TLC	Liters	7.21	(5.39)	(75)		
177	RV/TLC	%	37	(26)	•		
	Diffusion	•					
	DLCO VA	mL/min/mmHg Liters	32.3	(20.4) 6.36	(63)		
	DLCO/VA	1/min/mmHg	4.56	3.21	70		







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AUSTIN, TEXAS 78705



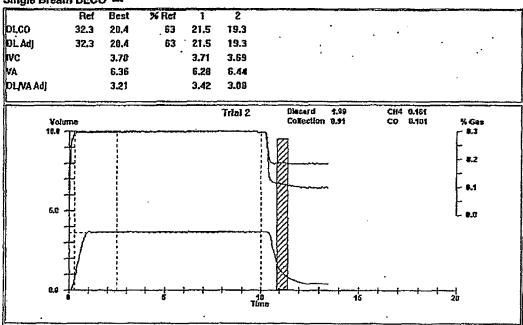
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Date: 07/09/99

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Single Breath DLCO ---



CONSULTANTS OF AUST"

1305 WEST 34TH STREET JITE 400
AUSTIN, TEXAS 78705



Date: 07/09/99

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### Flow Volume Loop

	Ref	Best	% Ref	1	2	3	4	
FVC	4.57	4.90	98	4.00	4.00	3,90	3.77	•
FÈVI	3.46 .		93	3,21 ·	3.15	3.08	3.60	
FEVI/FVC	76	80		80	79	79	80	•
FEF25-75%	2.99	3.16	105	3.16	2.95	2.84	3.00	
PEF	8.36	9.15	109	9.15	8.78	8.57	7.89	
Trial 1		Trial 2	7	rial 3	7	Trial 4		Flow Best
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NAME:

NICKNAME:

GROUP NAME:

CANTRELL, C



# WORK HISTORY SHEET

EMPLOYER: SEE ATTACHED LIST	SUPERVISOR: Jin Hickey					
JOB SITE: SEE ATTACHED LIST	NAMES OF COWORKERS & JOB TITLES:					
CITY, STATE: SEE ATTACHED LIST  DATE OF JOB: SEE ATTACHED LIST  EXPOSURE TO	H.E. Baker John Stokes W.G. Richardson H.G. Splawn J.B. Butler					
ASBESTOS PRODUCTS:						
LENGTH OF JOB:						
MY DUTIES AT THIS JOB SITE: Pipe fitter	ON THIS JOB SITE WERE YOU EXPOSED ANY OF THE FOLLOWING:					
WAS JOB NEW CONSTRUCTION ; REPAIR ; or BOTH X	CHEMICALS YES NO X FUMES YES X NO					
WAS JOB INDOORS?; OUTDOORS?; or BOTHX	GASES YES X NO CHROMIUM YES NO X CADMIUM YES NO X					
REASON FOR LEAVING: Retired Early Ret.	ANY OTHER PRODUCT YES NO X LIST:					
WAGE RATE/HOUR: Don't Rember	DID YOU WEAR A RESPIRATOR, MASK OR					
AVERAGE HOURS WORKED/WEEK: 40+ PERCENTAGE OF TIME EXPOSED TO ASBESTOS PRODUCTS: 100%	OTHER PROTECTIVE DEVICE ON THIS JOB					
	COMMENTS:					

all Kinds askertes

WITE AROUND

SEE ATTACHMENT 'A'
FOR PRODUCTS USED AT VARIOUS SITES

EXHIBIT "B"

WORK HISTORY SHEET - Page 1
T:\PID\workhistories\Cantrell.C\copeland,doy.wpd (cmk)11/10/98

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OTEN YE. COO'S NAME:

CANTRELL, C



WORK HISTORY SHEET

# EMPLOYERS AND JOB SITES

Tim Smelter lud Swelder Plant Wedgs Cloy, Texas Machanist Paper Arther I specator 13+7-1952

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Moderate C Torsante Chemical Plant Texas City, Texas . 331-1989

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NAME:

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NICKNAME: GROUP NAME:

CANTRELL.C

# WORK HISTORY SHEET

# Attachment A Product List

ASBESTOS MATERIALS USED ON THIS JOB AND COMPANY: WORKED				
		WITH	AROUND	
INSULATING CEMENT:	Johns-Manville		X	
	Calsilite		· X	
	Grefco		X	
	Calcrete		X	
GUN MIX:	Unknown		X	
FÎREPROOFING:	Unknown	•	х	
GASKETS:	Flexitallic	X	x	
	Armstrong	X	Х	
	Garlock '	Х	X	
PACKING:	Garlock	x	Х	
	Johns-Manville	Х	X	
PIPE COVERING:	Kaylo		x	
•	Calsilite		X	
	Mundet		X	
BLOCK INSULATION:	Unknown		x	
FIRE BLANKETS:	Unknown		х	
TRANSITE PIPE:	Johns-Manville	X	X	
	Chemitite/Haveg	X	X	
BOILERS:	Unknown		х	
AIR COMPRESSOR:	Ingersoll-Rand	Х	. X	

WORK HISTORY SHEET - Page 3
T:\PID\workhistories\Cantrell.C\copeland,doy.wpd (cmk)11/10/98



# Case 01-01139-AMC Duc 13020-9 Filed 11/10/00 Page 32 of 59-

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NAME:

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NICKNAME:

GROUP NAME:

CANTRELL.C

WORK HISTORY SHEET

ASBESTOS MATERIALS USED ON THIS JOB AND COMPANY:

WORKED

<u>WITH</u>

AROUND

CONTRACTORS:

Brown & Root, Inc.

X

Unknown

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Please indicate where and when you used this product.
1) Employer: Mans anto Chem
2) Occupation Code: Pige Ritter
3) Name of Supervisor: Jim Heckey
4) Job Site Location: Monado City: Texas (ity State YK
5) Years: From: 1932 To: 1982

1) Employer: Tin Grand for
2) Occupation Code: Projection & specific
3) Name of Supervisor: Agestin Washer
4) Job Site Location: TEXES C. Ty City: EXES C. TT State TX
5) Years: Hom 46 To: 1952

1) Employer:	
2) Occupation Code:	
3) Name of Supervisor:	
4) Job Site Location: City:	State
5) Years: From:To:	

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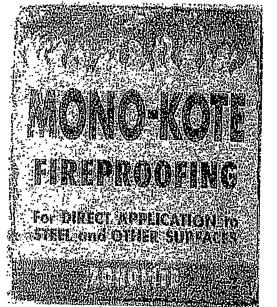
Please indicate	where and	when you	used this	product.

- 1) Employer: Fin Smelfere
  2) Occupation Code: 41-55
- 3) Name of Supervisor: Austin Weeks
- 4) Job Site Location: Texas City City: Texas State TX
- 5) Years: From: 46 To: 55
- 1) Employer:
- 2) Occupation Code: 41-57
- 3) Name of Supervisor: Jem Heckey
- 4) Job Site Location: Mansarto City: TX. City State TX
- 5) Years: From: 52 To: 52
- 1) Employer:
- 2) Occupation Code: At 1 55 Stone I wilsten
- 3) Name of Supervisor: DONT Know construction)
- 4) Job Site Location: Marasano City: 1ex # State X
- 5) Years: From: Der or 2 most No 51-52

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# Monokote Fireproofing

I worked WITH \_\_\_\_\_ this product.

I worked AROUND this product.

Pg. 2

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Please indicate where and when you used this product.

The state of the s	ou used this product.
1) Employer: Mansanto	Ch. Tevas Cites
·2) Occupation Code: 41-55	_
3) Name of Supervisor:	Same
Name of Supervisor:      Job Site Location:	
5) Years: From:To:	• •
1) Employer:	
2) Occupation Code:	
3) Name of Supervisor:	•
4) Job Site Location:	City:State
5) Years: From:To:	
1) Employer:	
2) Occupation Code:	
3) Name of Supervisor:	
4) Job Site Location:	
5) Years: From:To:	

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Monokote Fireproofing

I worked WITH \_\_\_\_\_ this product\_

I worked AROUND \_\_\_\_

Pg. 2

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Please indicate where and when you used this product.

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1) Employer: Ton S	0 .
1) Employer: Ten Sine 2) Occupation Code: 41-5	5_
3) Name of Supervisor: Atisfi	· Zelecks
4) Job Site Location: TEXES ()	City: Text. Aty State X
5) Years: From: 46 To: 5	Gor 7 years

1) Employer: Marshoto 20
2) Occupation Code:
3) Name of Supervisor: Jun History
4) Job Site Location: Tex. City: Tex Coty State TX
5) Years: From: 52 To: 82 38 years

1) Employer: Stance & Wolate (Manala )
2) Occupation Code: \$1-55 \ united & nq.
3) Name of Supervisor: Don't Know
4) Job Site Location: Marsanto Co City: Tex. Coty State TX
5) Years: From: Betrailer 1851 - 1852

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1) Employe	Tin smelter
	on Code: 41 ~ 55
	Supervisor: Bustin Weaks
4) Job Site L	ocation: Tex Crty City: Tex, City State IX
5) Years:	From 6446 To: 1951 77

1) Employer: Stone Webste & resided Enq.
2) Occupation Code: 41-55 (Costruction)
3) Name of Supervisor: Tant Know
4) Job Site Location: Manager City: Tex. Cty State TX. 5) Years: From: To:
5) Years: From: 7 between 1951-52

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WR GRACE PIQ 017409-0037

Zonolite Plaster

I worked WITH \_\_\_\_ this product.

I worked AROUND \_\_\_\_ this product.

Pg. 3

If used at this sete I was in Contact with this Probet

Please indicate where and when you used this product. 1) Employer: 2) Occupation Code: 41 -3) Name of Supervisor: 4) Job Site Location: 5) Years: Tin Smelter Texas City 1) Employer: 2) Occupation Code: 3) Name of Supervisor: \_\_\_ 4) Job Site Location: From: 46 To: 51 5) Years: 1) Employer: 2) Occupation Code: \_ 3) Name of Supervisor: \_ 4) Job Site Location: \_\_\_\_\_ City: 5) Years: From: To:\_

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#### **Zonolite Monokote Fireproofing**

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Please indicate where and when you used this product.		
1) Employer: Try Smelter		
2) Occupation Code: 41-55 -operator		
3) Name of Supervisor: Hustin West 5		
4) Job Site Location: Lex Fifty City: Les Coff State TX		
5) Years: From [GA] To: 51 ? ?		
1) Employer: MARRANTO		
2) Occupation Code: 41-53		
3) Name of Supervisor: Jim History.		
4) Job Site Location: Telegraphy City: Texiloty State X		
5) Years: From 52 To:-1982		
1) Employer: exerce Webston - writer Engs.		
2) Occupation Code: 41-55		
3) Name of Supervisor: Tant Know		
4) Job Site Location: Mangaroto City: TX. Coff State TX  between 51-521		
5) Years: From: 7 To: 7		

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I worked AROUND this product.			

Zonolite Monokote Fireproofing

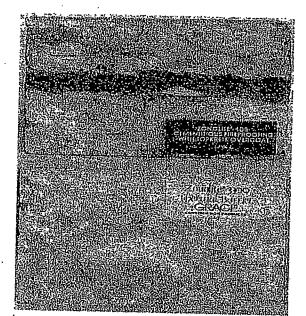
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Please indicate where and when you used this product.

1) Employer: Mars Cato Co
2) Occupation Code: 41 -55
3) Name of Supervisor:
4) Job Site Location: City: State
5) Years: Froms <u>52</u> To: <u>\$2</u>

1) Employer:	
2) Occupation Code:	
3) Name of Supervisor:	
4) Job Site Location:City:	State
5) Years: From:To:	

1) Employer:		· · · · · · · · · · · · · · · · · · ·
2) Occupation Code:		
3) Name of Supervisor:		
4) Job Site Location:	City:	State
5) Years: From:To:		



### Zonolite Fireproofing

Pg. 5

I worked WITH \_\_\_\_\_ this product. I worked AROUND \_\_\_\_\_ this product.

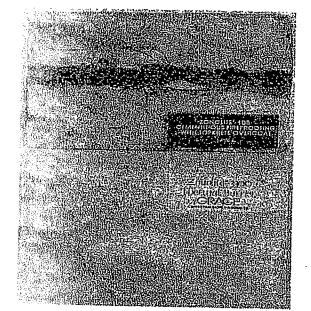
Please indicate where and when you used this product.

1) Employer: Tim Smalten
2) Occupation Code: 45-55
3) Name of Supervisor: Outstin Wast 5
4) Job Site Location: Tex Tex City: Quite State X
5) Years: From: 46 Toz 51

1) Employer: Massarto
2) Occupation Code: 41 55
3) Name of Supervisor: Jan Heckey
4) Job Site Location: Mansho City: Tex Cify State 14
5) Years: From 52 To: 1952

1) Employer Stone Webstar- Wested Fine 5-
2) Occupation Code: 46-54
3) Name of Supervisor: Josef Know
4) Job Site Location: Manuato City: TX Coto State
5) Years: From: Boxwellow 7

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Zonolite Fireproofing

I worked WITH \_\_\_\_\_ this product\_

Pg. 5

I worked AROUND this product.

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Please indicate where and when you used this product.

1) Employer: Manuanto Co
2) Occupation Code: 41 - 55
3) Name of Supervisor:
4) Job Site Location: Texas Of The State State
5) Years: From: <u>52</u> To: <u>\$2</u>
1) Employer:

1) Employer:		<del></del>
2) Occupation Code:		
3) Name of Supervisor:		-
4) Job Site Location:	City:	State
5) Years: From:To:	-	

1) Employer:	•
2) Occupation Code:	
3) Name of Supervisor:	
4) Job Site Location:City:	State
5) Years: From:To:	



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### Zonolite Monokote MK-5 Fireproofing

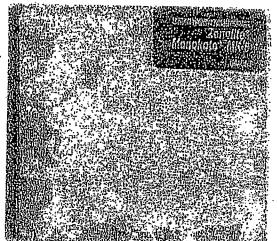
I worked WITH \_\_\_\_\_ this product.

I worked AROUND \_\_\_\_\_ this product.

Dorof Kneer

Please indicate where and when you used this product.		
1) Employer: Ten Swelter		
2) Occupation Code: 41 - 5-3		
3) Name of Supervisor: Austin Weaks		
4) Job Site Location: TEXAS City City: TOXAS City State TX		
5) Years: From 16 To: 5 0		
1) Employer: Transacto W		
2) Occupation Code:41~55		
3) Name of Supervisor: Jim Hechy		
4) Job Site Location: Mansato City: The City State X		
5) Years: Front 52 To: 1865		
1) Employer Hone Webstay winted Engs		
2) Occupation Code: $41-53$		
3) Name of Supervisor: Dent Krow		
4) Job Site Location: MBARA City: TX. City State X		
5) Years: From: To: 1951-1952?		

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# WR GRACE PIQ 017460-0043

Pg. 6

## Zonolite Monokote MK-5 Fireproofing

I worked WITH \_\_\_\_ this product.

I worked AROUND \_\_\_\_\_ this product.

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Please indicate where and when you used this produc	t.
1) Employer: Mansanto	
2) Occupation Code: 41 - 55	
3) Name of Supervisor:	•
4) Job Site Location: Texas Cify TX	State
5) Years: From 52 To: 82	·
1) Employer: Tin Simel few	· · · · · · · · · · · · · · · · · · ·
2) Occupation Code: 41-55 aperator	
3) Name of Supervisor:	
4) Job Site Location:City:	State
5) Years: From: To: 5/	
1) Employer:	
2) Occupation Code:	
3) Name of Supervisor:	
4) Job Site Location:City:	State
5) Years: From:To:	:

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5 ·	
Product Name:	WR GRACE PIQ 017400004
I worked WITH this product.	Pg. /
I worked AROUND this product.	
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# CAUSE NO. <u>980 VD 67</u>8



CHARLES THOMAS CANTRELL, JR. AND NELLIE DAPAN CANTRELL; HAROLD CARLTON ALLEN AND JESSIE LEE ALLEN; DARWIN DOYLE CALHOUN AND CAROLYN SUE CALHOUN;

**EDMUND GILLIS DOHERTY** AND ETHEL LOUISE DOHERTY; WALTER JOSEPH DONOVAN AND BILLIE GRACE DONOVAN; JOHN EDWARD FABAIN; KENNETH WAYNE HOLLEMAN AND LENA FAYE HOLLEMAN; FRANK RAY; JOHN I. WIGGINS AND BEULAH WIGGINS;

Plaintiffs,

VŠ.

**OWENS-CORNING FIBERGLAS** CORPORATION: PITTSBURGH CORNING CORPORATION (successor to UNARCO INDUSTRIES, INC.); GARLOCK INC; CROWN CORK AND SEAL COMPANY, INC. (successor to MUNDET CORK COMPANY): METROPOLITAN LIFE INSURANCE COMPANY; FOSTER WHEELER ENERGY CORPORATION; W. R. GRACE & CO.-CONN. (successor to W. R. GRACE & COMPANY); THE ANCHOR PACKING COMPANY; NORTH AMERICAN REFRACTORIES COMPANY; PROKO INDUSTRIES, INC.; SYNKOLOID, A DIVISION OF MURALO CO., INC.; GEORGIA-PACIFIC CORPORATION (individually and as successor to BESTWALL GYPSUM COMPANY); MINNESOTA MINING AND MANUFACTURING COMPANY (a/k/a "3M"); U.S. MINERAL PRODUCTS COMPANY; THE FLINTKOTE COMPANY; HARBISON-WALKER REFRACTORIES COMPANY (formerly a division of INDRESCO INC.); UNIROYAL HOLDING, INC. (successor to U. S. RUBBER

IN THE DISTRICT COURT

GALVESTON COUNTY, TEXAS

PLAINTIFFS' ORIGINAL ASBESTOS PETITION/TEXAS EXPOSURE AND/OR TEXAS RESIDENT Page 1 U:\galveston\cantrell\rorig.PET.wpd

EXHIBIT

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COMPANY); KELLY-MOORE PAINT OMPANY, INC.; AQUĂ-CHEM, INC. (d/b/a THEAVER-BROOKS DIVISION); RAPID-AMERICAN CORPORATION (as successor-bymarger to GLEN ALDEN CORPORATION, BRIGGS MANUFACTURING CO., PHILIP CAREY CORPORATION AND PHILIP CAREY MANUFACTURING COMPANY); RAISER ALUMINUM & CHEMICAL CORPORATION; COMBUSTION PEGENEERING, INC.; RILEY STOKER CORPORATION; GENERAL ELECTRIC COMPANY; GAF CORPORATION (successor to RUBEROID CORPORATION); U.S. GYPSUM COMPANY; A.P. GREEN WIDUSTRIES (f/k/a A.P. GREEN YEERACTORIES COMPANY, a subsidiary of S GYPSUM COMPANY); ARMSTRONG WORLD INDUSTRIES, INC. (successor to ARMSTRONG CORK COMPANY); GBESTOS CLAIMS MANAGEMENT CORPORATION (c/o NEW NATIONAL EVESUM COMPANY, f/k/a NATIONAL THE PSUM COMPANY); QUIGLEY-COMPANY, INC.; GASKET HOLDINGS, NC., (successor to FLEXITALLIC GASKET COMPANY); DANA CORPORATION; CHANERAL REFRACTORIES COMPANY; J.T. HORPE COMPANY; BROWN & ROOT, INC. (f/k/a BROWN & ROOT USA, INC., BROWN & ROOT USA DELAWARE INC. which is the successor-in-interest to BROWN & ROOT USA INC.); ACandS, INC.; AND T&N ale (f/k/a TURNER & NEWELL PLC); GUARD-LINE, INC.; P.P.G. INDUSTRIES, INC.; (successor to PITTSBURGH CORNING CORPORATION); MONSANTO COMPANY, a Delaware Corporation (f/k/a MONSANTO CHEMICAL COMPANY); UNION CARBIDE CORPORATION; AMOCO CORPORATION; AMOCO OIL COMPANY; AMOCO CHEMICAL COMPANY; MARATHON OIL COMPANY (f/k/a USS HOLDINGS COMPANY); MARATHON PETROLEUM

56 JUDICIAL DISTRICT

PLAINTIFFS' ORIGINAL ASBESTOS PETITION/TEXAS EXPOSURE AND/OR TEXAS RESIDENT Page 2 U\galveston\cantrell\rorig.PET.wpd



COMPANY (f/k/a/ THE OIL COMPANY, MARATHON OIL COMPANY); CROWN OIL COMPANY; CROWN CENTRAL PETROLEUM CORPORATION; PETRO-TEX CHEMICAL CORPORATION; STERLING CHEMICAL, INC.; THE M.W. KELLOGG COMPANY; FLUOR DANIEL, INC.; SHELL OIL COMPANY; SHELL CHEMICAL COMPANY; EXXON CORPORATION; EXXON CHEMICAL COMPANY (d/b/a EXXON CORPORATION); THE DOW CHEMICAL COMPANY; E.I. DU PONT DE NEMOURS AND COMPANY, INC.: GOODYEAR RUBBER & TIRE COMPANY: HOUSTON LIGHTING & POWER; ETHYL CORPORATION; TODD SHIPYARDS CORPORATION:

Defendants.

#### PLAINTIFFS' ORIGINAL ASBESTOS PETITION, TEXAS EXPOSURE AND/OR TEXAS RESIDENT

#### TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW, Plaintiffs, (the name and residence of each Plaintiff is shown on the attached Exhibit "A" and incorporated herein for all purposes) complaining of the various Defendants listed below and for cause of action would show the Court and Jury as follows:

1. Plaintiffs reside in the State of Texas, resided in the State of Texas at the time of their exposure to asbestos fibers in Defendants' products, and/or sustained substantial exposure to asbestos fibers in Defendants products while in the State of Texas.

<u>PLAINTIFFS' ORIGINAL ASBÉSTOS PETITION/TEXAS EXPOSURE AND/OR TEXAS RESIDEN</u>T Page 3 U:\galveston\cantrell\rorig.PET.wpd



# IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

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IN RE:		) Chapter 11	
W.R. GRACE & CO., et al.	Debtors.	) Case No. 01-01139 (JKF) ) Jointly Administered )	
<u>(</u>	CLAIMANT PRI	VILEGE LOG	
information withheld as privileg Grace Asbestos Personal Injury	ed and/or subject	submits the following log of documents and/or to the other protection in response to the W.R.	
Date of item	Desc	Description of item or information withheld	
6/29/98	Mami	ining. report by Russell McDonald	
Respectfully Submitted,		·	
REDACTED			